

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

THE ROMAN CATHOLIC DIOCESE OF PATERSON, NEW JERSEY, FATHER MANUEL ALEJANDRO CUELLAR CEBALLOS, FATHER REGIN NICO DELA CRUZ QUINTOS, FATHER JOEMIN KHARLO CHONG PARINAS, FATHER ARMANDO DIAZ VIZCARA JR., and FATHER JOSEPH ANTHONY AGUILA MACTAL,

Plaintiffs,

-v-

U.S. DEPARTMENT OF STATE, U.S. DEPARTMENT OF HOMELAND SECURITY, U.S. CITIZENSHIP AND IMMIGRATION SERVICES, ANTHONY BLINKEN, IN HIS OFFICIAL CAPACITY AS SECRETARY OF THE U.S. DEPARTMENT OF STATE, ALEJANDRO MAYORKAS, IN HIS OFFICIAL CAPACITY AS SECRETARY OF THE U.S. DEPARTMENT OF HOMELAND SECURITY, and UR MENDOZA JADDOU, IN HER OFFICIAL CAPACITY AS DIRECTOR, U.S. CITIZENSHIP AND IMMIGRATION SERVICES,

Defendants.

Civ. No: 2:24-CV-08350-JXN-MAH

District Judge: Hon. Julien Xavier Neals
Magistrate Judge: Hon. Michael A. Hammer

RETURN DATE: Dec. 16, 2024

NOTICE OF MOTION

TO: U.S. Department Of State
U.S. Department of Homeland Security
U.S. Citizenship and Immigration Services
Anthony Blinken

Alejandro Mayorkas
UR Mendoza Jaddou

PLEASE TAKE NOTICE that on December 16, 2024 at 9:00 o'clock in the forenoon or as soon thereafter as counsel may be heard, Plaintiffs, The Roman Catholic Diocese of Paterson, New Jersey, Father Manuel Alejandro Cuellar Ceballos, Father Regin Nico Dela Curz Quintos, Father Joemin Kharlo Chong Parinas, Father Armando Diaz Vizcara Jr. and Father Joseph Anthony Aguila Mactal, ("Plaintiffs") shall move before the United States District Court of New Jersey, at the Clarkson S. Fisher Federal Building and United States Courthouse, 402 East State Street, Room 2020, Trenton, New Jersey for an Order staying all proceedings in this civil action through and including December 31, 2024. Counsel for Defendants have advised that they do not oppose this motion.

PLEASE TAKE FURTHER NOTICE that in support of this application, Plaintiffs shall rely upon the Brief in Support of Unopposed Motion to Stay the Proceedings, and a proposed form of Order.

Dated: November 11, 2024

NORRIS McLAUGHLIN, P.A.
Attorneys for Plaintiffs

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CERTIFICATE OF SERVICE

I, Robert Mahoney, hereby certify that on November 11, 2024, the attached Plaintiffs' Brief in Support of Unopposed Motion to Stay the Proceedings, has been served on Counsel for Defendants via this Court's Electronic Case Filing ("ECF") system, which provided electronic notice to all attorneys of record. I further certify that Counsel for Defendants is registered with this Court's ECF system and is duly able to receive service by and through this Court's ECF system.

Respectfully Submitted:

NORRIS McLAUGHLIN, P.A.

Dated: 11/11/2024

/s/ Robert Mahoney
Robert Mahoney
rmahoney@norris-law.com
Attorneys for Plaintiffs